

# ANDREW DELANEY

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February 15, 2022

**Via CM/ECF**

Hon. Zahid N. Quraishi  
United States District Court for the District of New Jersey  
402 State Street  
Trenton, NJ 08608

Re: *Lavine, et al v. American Academy of Pediatrics, Inc.*, No. 3:21-cv-17099

Dear Judge Quraishi,

I represent the Plaintiffs, Adam, Shingo, and Aiko Lavine in the above-referenced action. Plaintiffs seek the *pro hac vice* admission of David J. Llewellyn, Esq. of Law Office of David J. Llewellyn. I am a member in good standing of the bar of this Court and agree to be responsible for the conduct of Mr. Llewellyn throughout this litigation.

Pursuant to your judicial preferences, counsel for all parties consent to Mr. Llewellyn's *pro hac vice* admission. Attached, please find: (1) the Declaration of David J. Llewellyn, Esq. in Support of Admission *Pro Hac Vice*; and (2) the [Proposed] Order Granting David J. Llewellyn's *Pro Hac Vice* Admission.

Please let us know if we may provide any additional information to assist the Court in its consideration of this application.

Respectfully submitted,



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Andrew DeLaney, ESQ.

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By: Andrew DeLaney, Esq.  
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*Attorney for Plaintiffs Shingo Lavine,  
Adam Lavine, and Aiko Lavine*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

SHINGO LAVINE, ADAM LAVINE, AND  
AIKO LAVINE,

Plaintiffs,

v.

AMERICAN ACADEMY OF PEDIATRICS, INC

Defendant.

Civil Action No.: 3:21-cv-17099

DECLARATION OF DAVID J.  
LLEWELLYN, ESQ. IN SUPPORT OF  
ADMISSION *PRO HAC VICE*

DAVID J. LLEWELLYN, of full age, declares under penalty of perjury pursuant to 28  
U.S.C. § 1746 as follows:

1. I am a sole practitioner using the trade name Law Office of David J. Llewellyn,  
3400 Peachtree Rd., NE, Suite 1603, Atlanta, Georgia 30326-1107, Telephone: (404) 262-3343  
Facsimile (404) 445-7752, email: david@llewellynlawfirm.com.

2. I submit this Declaration in support of my application for *pro hac vice* admission  
as attorney for plaintiffs Shingo Lavine, Adam Lavine and Aiko Lavine before this Court.

3. I am a member in good standing of the State Bar of Georgia, the Superior Courts  
of Georgia, the Court of Appeals of Georgia, the Supreme Court of Georgia, the United States

Supreme Court, the United States Court of Appeals for Second Circuit, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Eleventh Circuit, and the United States District Courts for the Northern and Middle Districts of Georgia. I was admitted to the United States District Court for the Southern District of Georgia on January 27, 1984 but later voluntarily resigned due to onerous pro bono requirements in the district and lack of business in the district. No disciplinary proceedings are pending against me in any jurisdiction, and I have never been disbarred or suspended in any jurisdiction.

4. In accordance with L. Civ. R. 101(c), I have included the date of my admission and contact information for each of the above Bars.

Georgia State Bar/Georgia Superior Courts  State Bar of Georgia 104 Marietta St., NW Suite 100 Atlanta, GA 30303  Telephone: (404) 527-8700	Admitted: November 13, 1979
Court of Appeals of Georgia 330 Capitol Avenue, SE Suite 1601 Atlanta, GA 30334 Telephone: (404) 656-3450	Admitted: January 4, 1980
Supreme Court of Georgia 330 Capitol Avenue, SE 1 <sup>st</sup> Floor, Suite 1100 Atlanta, GA 30334 Telephone: (404) 656-3470	Admitted: January 4, 1980
United States District Court for the Northern District of Georgia 2211 United States Courthouse 75 Ted Turner Drive, SW Atlanta, GA 30303-3309 Telephone: (404) 215-1600	Admitted: January 4, 1980

United States District Court for the Middle District of Georgia 475 Mulberry Street Macon, GA 31201 Telephone: (478) 752-3497	Admitted: February 22, 1983
Supreme Court of the United States 1 First Street, Northeast Washington, District of Columbia 20543 Telephone: (202) 479-3000	Admitted: March 2, 1998
United States Court of Appeals for the Second Circuit 40 Foley Square New York, New York 10007	Admitted: June 14, 2005
United States Court of Appeals for the Fifth Circuit Clerk's Office 600 S. Maestri Place, Suite 115 New Orleans, LA 70130 Telephone: (504) 310-7700	Admitted: January 21, 1980 (Old) January 4, 1982 (New)
United States Court of Appeals for the Eleventh Circuit 56 Forsyth Street, NW Atlanta, GA 30303 Telephone: (404) 335-6100	Originally Admitted: January 4, 1982, membership lapsed due to accidental non- payment of renewal fee Re-Admitted: May 11, 2017

5. Plaintiffs have asked me to represent them in this matter.

6. I previously made a payment in the amount of \$212.00 to the New Jersey Lawyers' Fund for Client Protection for 2021 when I was admitted *pro hac vice* in this case before it was removed to this Court from the Superior Court of New Jersey for Mercer County. I have paid the renewal fee of \$212.00 for 2022, as provided by New Jersey Court Rule 1:28-2(a).

7. Pursuant to Local Civil Rule 101(c)(3), if I am admitted to appear *pro hac vice*, a payment will be made in the amount of \$150.00 to the Clerk of the United States District Court for the District of New Jersey.

I, David J. Llewellyn, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 12, 2022 in Atlanta, Georgia.

  
David J. Llewellyn

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Attorney for Plaintiffs Adam Lavine, Shingo Lavine and Aiko Lavine

Attorney ID: 095232013

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<p>ADAM, AIKO AND SHINGO LAVINE,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>AMERICAN ACADEMY OF PEDIATRICS, INC.</p> <p>Defendant.</p>	<p>Case No.: 3:21-cv-17099</p> <p><b>[PROPOSED] ORDER GRANTING DAVID J. LLEWELLYN'S <i>PRO HAC</i> VICE ADMISSION</b></p>
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This matter having been opened to the Court upon application by Plaintiff Adam, Shingo and Aiko Lavine's counsel, Andrew DeLaney, Esq., pursuant to Local Civil Rule 101.1(c) for an Order granting the *pro hac vice* admission of David J. Llewellyn, Esq. of Law of Office of David J. Llewellyn on behalf of Adam, Shingo and Aiko Lavine; and the Court having considered the papers submitted in support of this application; and for good cause shown

IT IS on this \_\_\_\_\_ day of February, 2022,

ORDERED that David J. Llewellyn, Esq. of Law Office of David J. Llewellyn, a member in good standing of the Bars in which he is admitted, be permitted to appear *pro hac vice* in this action pursuant to Local Civil Rule 101.1(c); however, all pleadings, briefs and other papers filed with the Court on behalf of Defendant shall be signed by Andrew DeLaney, Esq., who is admitted to practice before this Court, who shall be responsible for all papers, and for the conduct of Mr. Llewellyn, and who shall be present in Court during all phases of these proceedings unless expressly excused by the Court, and who will be held responsible for the conduct of the attorneys admitted hereby; and it is

FURTHER ORDERED that David J. Llewellyn shall pay \$150.00 to the Clerk of the United States District Court of New Jersey; and it is

FURTHER ORDERED that David J. Llewellyn shall remit to the New Jersey Lawyer's Fund for Client Protection the annual payment required in accordance with New Jersey Court Rule 1:28-2(a) for each calendar year the case is pending; and it is

FURTHER ORDERED that David J. Llewellyn shall be bound by the Rules of the United States District Court for the District of New Jersey including, but not limited to the provisions of L. Civ. R. 103.1, Judicial Ethics and Professional Responsibility and L. Civ. R. 104.1 Discipline of Attorneys; and it is

FURTHER ORDERED that David J. Llewellyn shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Contingency Fee Rule 1:27-7, as amended.

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Hon. Zahid N. Quraishi, U.S.M.J.